

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,
et al.,**

**Plaintiffs and
Counterclaim Defendants,**

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., et al.,**

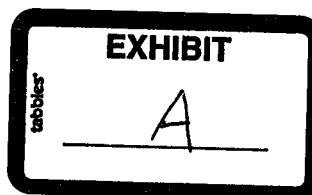
**Defendants and
Counterclaim Plaintiffs.**

Case No. 4:16-cv-02163

**NOTICE OF DEPOSITION OF COUNTERCLAIM DEFENDANT
MISSOURI PRIMATE FOUNDATION**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Counterclaim Plaintiff People for the Ethical Treatment of Animals, Inc., by and through its attorneys, will take the deposition of Counterclaim Defendant Missouri Primate Foundation ("MPF") on January 31, 2019, beginning at 9:00 a.m. The deposition will take place at the offices of Polsinelli, 100 S. Fourth Street, Suite 1000, St. Louis, Missouri 63102.

Pursuant to Rule 28 of the Federal Rules of Civil Procedure, the deposition will be taken before a person authorized to administer oaths in Missouri. It will be recorded by stenographic means and it will be taken for the purpose of discovery and for use in this action. MPF is hereby directed to designate and produce one or more of their officers, directors, managing agents, or their designated persons to testify on their behalf as to known or reasonable known available information concerning the following topics:



1. Discussions by the MPF officers and directors regarding actions that would be (or that were) taken with respect to any the chimpanzees housed at Connie Casey's or MPF's facility, as referenced in Counterclaim Connie Braun Casey's Responses to Counterclaim Plaintiffs' Fourth Requests for Admission, No. 1.
2. Fundraising activities conducted, and donations received, by MPF and use of any remaining funds or assets after MPF's dissolution.
3. Actions taken by members of the MPF Board, in their capacity of MPF Board members, and records maintained by MPF of such actions, as referenced in Counterclaim Connie Braun Casey's Responses to Counterclaim Plaintiffs' Fourth Requests for Admission, No. 4.
4. Accounting records maintained by MPF, as referenced in Counterclaim Connie Braun Casey's Responses to Counterclaim Plaintiffs' Fourth Requests for Admission, No. 6.
5. MPF's funds and assets that were kept separate from those of Connie Casey, as referenced in Counterclaim Connie Braun Casey's Responses to Counterclaim Plaintiffs' Fourth Requests for Admission, No. 7, including how (and from whom) those funds and assets were obtained, decisions made regarding their use, and what became of those funds and assets after MPF's dissolution.
6. The facts upon which MPF relied in denying the allegations against MPF in Counterclaim Plaintiffs' claims. [ECF No. 31.]

Dated: December 31, 2018

Respectfully submitted,

/s/ Martina Bernstein
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*Attorneys for Defendants/
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CERTIFICATE OF SERVICE

I certify that on December 31, 2018, I caused the foregoing notice of deposition to be served on:

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/s/ Jared Goodman